

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -	X	
	:	
UNITED STATES OF AMERICA	:	<u>SEALED INDICTMENT</u>
	:	
- v. -	:	Sl 20 Cr. 51
	:	
CHANG ZOU,	:	
a/k/a "Chang Yu Zou,"	:	
a/k/a "Chang N. Zou,"	:	
a/k/a "Zou Chang Yu,"	:	
	:	
Defendant.	:	
	:	
- - - - -	X	

COUNT ONE
(Conspiracy to Commit Robbery)

The Grand Jury charges:

1. On or about November 28, 2019, in the Southern District of New York and elsewhere, CHANG ZOU, a/k/a "Chang Yu Zou," a/k/a "Chang N. Zou," a/k/a "Zou Chang Yu," the defendant, and others known and unknown, knowingly did combine, conspire, confederate, and agree together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, ZOU and others agreed to rob a gambling establishment in the vicinity of 67 Eldridge Street, New York, New York.

(Title 18, United States Code, Section 1951.)

COUNT TWO
(Robbery)

The Grand Jury further charges:

2. On or about November 28, 2019, in the Southern District of New York and elsewhere, CHANG ZOU, a/k/a "Chang Yu Zou," a/k/a "Chang N. Zou," a/k/a "Zou Chang Yu," the defendant, and others known and unknown, knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and did aid and abet the same, to wit, ZOU and others robbed a gambling establishment in the vicinity of 67 Eldridge Street, New York, New York.

(Title 18, United States Code, Sections 1951 and 2.)

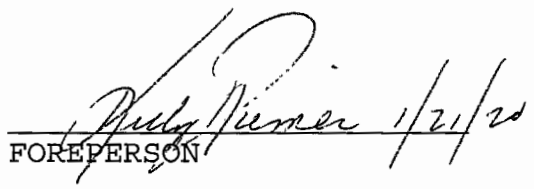
COUNT THREE
(Firearm Offense)

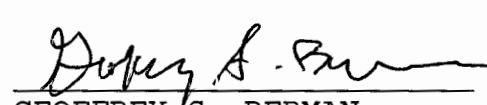
The Grand Jury further charges:

3. On or about November 28, 2019, in the Southern District of New York, CHANG ZOU, a/k/a "Chang Yu Zou," a/k/a "Chang N. Zou," a/k/a "Zou Chang Yu," the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the robbery charged in Count Two of this Indictment, knowingly did use and carry a firearm, and in furtherance of such crime, did possess a

firearm, which was brandished, and did aid and abet the same.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), (ii)
and 2.)


FOREPERSON


GEOFFREY S. BERMAN
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

CHANG ZOU,
a/k/a "Chang Yu Zou," a/k/a "Chang
N. Zou," a/k/a "Zou Chang Yu,"

Defendant.

SEALED INDICTMENT

S1 20 Cr.

(18 U.S.C. §§ 1951, 924(c), and 2.)

GEOFFREY S. BERMAN
United States Attorney


Foreperson

1/21/20

1/21/2020

^{superseding}
Filed Indictment under seal
Arrest warrant Issued

USMJ Gorenstein

MQ